

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

JOSÉ A. CRUZ-KERKADO, ET AL

Plaintiffs

v.

CIVIL CASE NO. 16-2748 (ADC)

COMMONWEALTH OF PUERTO RICO,
ET AL

Defendants

**DEFENDANT PRSA'S MOTION FOR LEAVE
TO FILE REPLY AND FOR BRIEF EXTENSION OF TIME**

TO THE HONORABLE COURT:

Defendant Puerto Rico Shooting Association a/k/a *Federación de Tiro de Armas Cortas y Rifles de Puerto Rico* ("PRSA"), by counsel, and without submitting to this Court's jurisdiction, respectfully prays and states:

1. On December 28, 2016, the Court entered an Order striking Plaintiffs' opposition to PRSA's motion to dismiss and granting additional time for Plaintiffs to file a proper opposition. The Court also urged Plaintiffs to file an amended complaint. (Docket No. 27). As a result, the Court denied PRSA's motion for leave to file a reply. (Docket No. 25).
2. On January 4, 2017, Plaintiffs filed an Amended Complaint. (Docket No. 29). That same day, Plaintiffs filed an Opposition to PRSA's motion to dismiss. (Docket No. 30).
3. Plaintiffs also filed a motion to "withdraw" without prejudice three (3) causes of actions presented in the original complaint. (Docket No. 28).

4. In view of the allegations in Plaintiffs' amended complaint and the new arguments raised in the most recently filed opposition to the motion to dismiss, PRSA believes that a reply is warranted. *See Local Rule 7(c).*

5. However, PRSA requires a brief extension of time (7 days) to provide a response to these new issues. PRSA submits that the parties will not be prejudiced by this extension.

WHEREFORE, PRSA respectfully requests that this Honorable Court allow PRSA to file a Reply to Plaintiffs' Opposition and that it grant a 7-day extension of time, until January 18, 2016, for PRSA to file this brief.

CERTIFICATE OF SERVICE

It is hereby certified that today I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

In San Juan, Puerto Rico, this 11th day of January, 2017.

**MORELL, BAUZÁ,
CARTAGENA & DAPENA
PO Box 13399
San Juan, Puerto Rico 00908
Tel. 787-723-1233; Fax. 787-723-8763**

S/Ramón Dapena
USDC No. 125005
ramon.dapena@mbcdlaw.com

S/German Brau
USDC No. 202805
german.brau@mbcdlaw.com

S/ Iván Lladó
USDC No. 302002
ivan.llado@mbcdlaw.com